

Docket A2015-2

April 29, 2015

Robert G. Taub
Acting Chairman
Postal Regulatory Commission
901 New York Avenue NW, Suite 200
Washington, DC 20268-0001

Dear Mr. Taub:

You will find attached a letter sent to the USPS Board of Governors regarding the Careywood, ID Post Office asking them to reverse the closure. Please consider the content of this letter as the PRC deliberates on our appeal of the closure of our post office.

Sincerely,

A handwritten signature in black ink that reads "M.E. Newsam Banks". The signature is written in a cursive, flowing style.

Marrion E. Newsam Banks
PO Box 360
Careywood, ID 83809

April 14, 2015

James H. Bilbray, Acting Chairman
United States Postal Service - Board of Governors
Room 10300
475 L'Enfant Plaza SW
Washington, D.C. 20260-1000

Dear Chairman Bilbray:

I am writing the Board of Governors today for the purpose of enlisting your help to halt the closure of the Careywood, ID Post Office. With the support of Senator Crapo, the Bonner County Board of Commissioners, and the entire Careywood community, I implore the Board of Governors to take this matter under consideration.

On February 20, 2015, we received notice via a flier in our post office box that our local Careywood Post Office in Bonner County, ID would be closed effective March 31, 2015. The flier notified us that our Post Office Box would be relocated to the Athol Post Office located 7.5 miles south in Kootenai County.

To say that we were surprised by this notice is to put it mildly. According to USPS regulations (and federal law), the USPS must notify the affected public and hold a **60-day comment period prior to closing a post office. Should the USPS decide to close a post office, the public has 30 days to appeal the decision to the Postal Regulatory Commission. Sixty days after it has made a closure decision, the USPS may then close a post office.**

We did **not** receive the required sixty days after the closure decision! We received notification of the closure on February 20, and the post office was slated for closure on March 31st! That's just barely 39 days! There was no 60-day comment period nor was there a 30-day appeal period! The first time we knew anything about a proposed closure was when we received the notice in our mailboxes. **In fact, the USPS didn't even notify all of the Careywood Post Office customers of the closure!** All the customers who receive mail on the Careywood rural mail route were left completely in ignorance until they were notified by a group of box holders by mail **at the box holders' expense!**

We have filed an appeal of our closure with the Postal Regulatory Commission (Docket 2015-2); however, I am well aware that all the PRC can do is remand the closure back to the US Postal Service ordering them to follow their own rules. Numerous letters and petitions have been filed by the citizens of Careywood, the Bonner County Commissioners and Senator Crapo's office explaining by this post office is critical to our community and should not be closed.

While it is not in the power of the PRC to ultimately halt the closure of our Post Office, the USPS Board of Governors does have that power, and I am appealing to you to use that power on our behalf.

This action by the USPS, if allowed to go unchallenged, will have a disastrous and negative impact on Careywood and its residents. The Post Office is the heart of Careywood, and has been since the 1800's. Closing it virtually wipes Careywood off the map! Even folks who get their mail delivered directly to them on the mail route come to the Post Office to pick up their packages, check out the bulletin board for what's new and say hello to their friends and neighbors. The Post Office is the heart of our community, and, without it, we will lose our most important community asset.

The USPS position with regard to the Careywood Post Office has been consistent throughout this entire unfortunate experience. As a "contract postal unit," we're not a "real" post office so the due process that the USPS would normally have to provide doesn't apply to us. Yet, 39 U.S.C. § 404(d) applies to **all** post offices. What exactly constitutes "real" to the US Postal Service? How long we've been in operation? The Careywood Post Office has been in this building since the 1930's - more than 75 years! Didn't we pay the same postal rates as everyone else at our post office? Didn't we send and receive mail there? Maybe the only thing that makes a post office "real" to the US Postal Service is the presence of employees protected by the American Postal Workers Union who would, no doubt, sue the pants off of them if they violated so much as a single letter of their own rules!

The USPS notified the box holders that we would be moved (whether we like it or not) to the Athol Post Office in Kootenai County. This will change the distance I personally drive to pick up our mail in the morning from 7 miles (round trip door-to-door) to 22 miles (round trip door-to-door). If we continue to pick up our mail 6 days a week as we have been in the habit of doing, and we compute our cost at the current IRS mileage reimbursement rate of 57.5 cents per mile, that increases our cost for just picking up our mail to an additional \$5,175 per year $((22-7) \times 6 \times 57.5)$! My husband is retired, and I only work part-time. This is an additional expense that we cannot easily bear, and we are relatively well off compared to other Careywood residents that are on even more limited incomes. Essentially, the USPS is trying to save money by taxing each and every Careywood Post Office customer to the tune of approximately \$5000 per year in increased driving expense. At 500+ residents, that's two and half million dollars! Keep in mind that I only get my mail once a day. Small business owners who have to make more than one trip to the post office each day will be hit even harder.

Even if money were no object, the trip up and down Highway 95 in our area is not always a safe one. In spite of recent highway improvements between Careywood and Athol, Highway 95 can still be a treacherous drive at the height of the tourist season and, particularly, in the

winter. The USPS is exposing each of the Careywood Post Office customers to increased risk on the highway with the goal of saving money for their bottom line.

Mail is heavily relied on in rural areas. Many of our residents do not have internet access. Their bills are received and paid via the mail. With the speed of first class mail already slowed, having to travel further to mail or receive bills is a hardship. I also know some residents who get their medications via the mail for whom a trip to the post office is not an optional activity. You may ask, why don't we just have a rural mail route box like others do? The fact is we keep a post office box because it's more secure for business and personal finance correspondence than a rural mail route box that is susceptible to theft and damage due to vandalism and road grader/snow plow assault.

Finally, the USPS may believe that somehow the changing nature of the way **urban** residents receive postal services has some relevance to rural postal customers like us making our post office less important or necessary. However, the postal customers of Careywood, ID do not have any other alternatives as suggested in the concurring opinion of the Alplaus, NY closure appeal (Docket A2012-88) when Commissioner Taub pointed out that "in the post-PAEA era alternate access options have grown significantly. In addition to traditional post offices, there are contract postal units, rural and highway carriers, village post offices, automated postal centers, approved shippers, the Internet, and retail establishments that sell stamps on consignment...."

If you allow the USPS to close our "contract postal unit," we won't have **any** options, let alone the ones suggested by Commissioner Taub above. Those of us on a rural mail route rarely, if ever, see our mail carriers unless he/she has a package to deliver. Is the Commissioner suggesting we wait around by our mailboxes until the mail carrier shows up each day to buy our stamps? You do realize that due to traffic, weather, etc. that isn't the same time every day and that, even in Careywood, ID, we have better things to do with our time? We have no automated postal centers in our area and the nearest "approved shippers" or "retail establishments that sell stamps" that aren't post offices are in Coeur d'Alene or Sandpoint (20-30 miles away). Finally, as I said before, the Internet hasn't quite made it all the households in Careywood, ID, and, given that the USPS is losing more and more business to the greater convenience and efficiency of the Internet every day, I'm surprised it is even suggested as an alternative! The fact is that postal customers in rural communities like Careywood have **fewer** options when it comes to postal service than people in more urban areas and, yet, here we have the USPS trying to reduce the one option we have **in our community** to zero!

For those of us living in the southern part of Careywood/Bonner County, the USPS has already made our lives more complicated by assigning us an Athol rural route address that makes it look as if we live in in Athol, ID 83801 which is in Kootenai County! Our experience has been that

this causes major confusion with emergency services, jury duty summons, package delivery, insurance, etc. We get notices from county and, sometimes, state agencies as if we reside in Kootenai County though we actually reside in Bonner County.

Earlier I said that the USPS is exposing the Careywood Post Office customers to increased risk on the highway just to save a few bucks. But will closing the Careywood Post Office, in fact, save the USPS money? The truck that picks up and delivers mail to the Careywood Post Office will still have to drive all the way north to Sagle (and Sandpoint) every day going right past Careywood. So, you aren't saving any money in the pick-up or delivery of the mail. The only money that would be theoretically saved is the contract amount paid to our postmaster, Carrie Bartelt, to operate our post office.

The rumor is that, with the addition of the Careywood box holders to their workload, the Athol Post Office is going to have to add another postal clerk to their roster. According to the Bureau of Labor Statistics (<http://www.bls.gov/oes/current/oes435051.htm#st>), the annual mean wage of a postal clerk in Idaho is \$45,700. Again, according to the BLS (<http://www.bls.gov/news.release/eccec.nr0.htm>), the average cost of benefits is approximately 30% of the employee's salary. So, the total cost of a new postal clerk at the Athol Post Office will be approximately \$59,410 or \$60,000 in round numbers. Compare this to the contract bid submitted by Carrie Bartelt on July 29, 2014 of approximately \$50,400 and, as you can see, **closing the Careywood Post Office will actually cost the US Postal Service \$9565!**

Before it was closed at the end of March, the Careywood Post Office showed a profit for the USPS. Since Carrie Bartelt took over the Post Office on August 1, 2014, the Careywood Post Office improved leaps and bounds! It was more secure and inviting and more customer-friendly. Carrie accepted debit and credit cards, was open during lunch hour, had extended the hours the post office was open, shipped internationally, and had provided Wi-Fi access, fax & copying services. As a result, the Careywood Post Office was operating at a net profit. In fact, year-to-date sales numbers showed a **40% increase!** At the end of the day, closing the Careywood Post Office won't save the USPS a single penny. In fact, you'll be losing money by closing down a profitable post office where sales are increasing.

In closing, there is no good rationale for closing the Careywood Post Office. The US Postal Service violated their own rules and procedures by closing our post office without a 60-day comment period and a 30-day appeal period. If they had bothered to gather local input via a questionnaire and community meetings, they would have realized how important this post office is to our rural community. **It is the sole source of postal service for our community.** In addition, closing the Careywood Post Office will not save the USPS any money. On the contrary, it will cost money both for the USPS and for the Careywood postal customers.

Chairman Bilbray, I urge you and the other members of the USPS Board of Governors to take action on behalf of the postal customers of Careywood, ID and **order a halt to the closure of our post office!** It is the vital core of our community providing critical services to local residents and small businesses.

Sincerely,

A handwritten signature in black ink that reads "M. E. Newsam Banks". The signature is written in a cursive, flowing style.

Marrion E. Newsam Banks
PO Box 360
Careywood, ID 83809